



TOWARDS
TRANSPARENCY

STRATEGY 2021-2025

Engaging change-makers

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1. FOREWORD

Towards Transparency's (TT) vision is a Vietnam free of corruption where people enjoy social justice, accountability and transparency in all aspects of society. We reflect on this vision daily in our work at TT and I see small steps of that long journey completed each year. It is what gives us hope for change and motivation to continue our efforts together with many towards a corruption-free Vietnam. We are immensely grateful for those who work side by side with us— young people, academics, journalists, NGOs, government ministries, embassies in Hanoi, the private sector and governments overseas.

While we note that the journey is far from over, we have seen some positive developments related to anti-corruption in Vietnam in the last five years. At the international level, Vietnam has been stepping up its efforts to deliver its international anti-corruption commitments under the United Nations Convention Against Corruption-UNCAC and embraced the SDGs agenda. Noteworthy trends include the adoption of Vietnam's first ever Law on Access to Information (2016), the comprehensive amendment of the Anti-Corruption Law (2018) and the prosecution of an unprecedented number of high-profile corruption cases. We have strived to seize this momentum, building on a number of key achievements and lessons learnt in the last period. TT contributed to Vietnam's national anti-corruption cause, including raising public awareness of corruption and its impact on socio-economic development, educating young people about anti-corruption and the benefits of integrity, promoting



Mrs. Nguyen Thi Kieu Vien, TT's Executive Director

key principles of open government, and advocating for the national law to be more in line with international standards. The results of TT's work are attributed to **our constructive engagement** with the Government agencies and effective partnership with a wide range of stakeholders from non-profit and private sectors as well as the media.

However, corruption remains a serious problem and barrier for many and is getting even more complicated worldwide as well as in Vietnam. Looking to 2025, we see both challenges and opportunities for continued engagement and impact. Anti-corruption discussions in Vietnam have gradually been moving from what corruption is to how to fight it.

Through **engaging change-makers**, especially young and female leaders, policy makers, business leaders, journalists, social activists and ICT innovators, TT's strategy aims to promote transparency and integrity in the following key strategic pillars:

- 1) Anti-Corruption Legislation & Enforcement;**
- 2) Citizen Engagement; and**
- 3) Business Integrity.**

In this process, we see **TT's role as an advocate, knowledge builder and facilitator, and co-creator of anti-corruption solutions.**

This strategy, building on our previous work and what we have learned, brings forth **four new elements**. First, we will work to increase **women's participation** in anti-corruption. Second, we will tackle **corruption risks in climate finance**. Third, TT will progressively strengthen its capacity as a **service provider** through integrity trainings for companies. Fourth, while further strengthening our partnerships and networks, we will **co-create anti-corruption tools** and solutions with partners with shared values to drive wider anti-corruption change.

Nguyễn Thị Kiều Viên

Founder, Executive Director

2. ANTI-CORRUPTION CONTEXT

Over the past five years, there have been increasing efforts and encouraging results in the fight against corruption in Vietnam, including improvements in both anti-corruption legislation and prosecution of corruption crimes. There are also positive changes in the public's attitude towards corruption, particularly the increasing public awareness of corruption's impacts, higher demand for social change, and acknowledgement of the role of values education.¹ However, while the Government's actions are perceived as more effective, corruption continues to be serious and deeply entrenched, and is seen as more and more complex² and of increasing concern for Vietnamese citizens³. The enforcement of legislation is still a big challenge and the space for civic participation in anti-corruption remains limited.

TT's 2021-2025 strategy mirrors the context of the country's significant political, socio-economic, and technological developments.

First, the ruling Communist Party of Vietnam (CPV) is accelerating preparations for the *XIIIth National Congress* in early 2021 which will elect new top leadership and adopt socio-economic development strategy towards 2030 as well as orientations and tasks for socio-economic development in the 2021- 2025 period. The national 2020 anti-corruption strategy is under review of which findings will serve as inputs for the development of another ten-year strategy and will inform potential adjustments of Vietnam's anti-corruption policies.

Second, Vietnam already launched the *National Action Plan on the implementation of the 2030 Agenda for sustainable development* which is the legal foundation for the Government to realize its international commitments and contribute to global sustainable development. The Action Plan, with two phases (2017- 2020 and 2021- 2030), including 17 sustainable development goals (SDGs) and 115 specific targets, provides a powerful framework for tracking Vietnam's progress in anti-corruption work (linked to SDGs 16.4 and 16.5⁴) on the one hand and promoting effective and inclusive governance for sustainable development⁵ on the other hand.

Third, we believe that significant trade treaties, including the *EU-Vietnam Free Trade Agreement (EVFTA)* and the *Comprehensive and Progressive Trans-Pacific Partnership Agreement (CPTPP)*, will provide significant opportunities for domestic companies and put more pressure and requirements on Vietnam to comply with international standards and regulations, including those on transparency, environment and human rights.

Fourth, the Government has issued a *national programme on digital transformation to 2025* with orientations to 2030 that promises to open up both government and economic activities, and improve the quality of public service delivery. The technological development, in combination with political and economic factors, will not only provide new tools and opportunities for anti-corruption, but also create new challenges, especially if combined with unchecked power, profit-seeking and poor regulations. Such challenges could lead to the emergence of new forms of corruption that result in the exclusion of certain parts of the population from accessing services (due to lack of adequate technical knowledge and facilities or mistakes/biases of the automated data analysis).

Finally, *the covid-19 crisis reinforces the need for stronger integrity*. Although at the time of the finalization of this strategy, the efficient and successful handling of the pandemic by the Vietnamese authorities is recognized internationally and helps increase the people's trust in the Government, it does not justify the circumvention of anti-corruption regulations. Indeed, transparency, oversight and accountability in the public sector will be even more pertinent if public investments will increase to mitigate the crisis. Specifically, corruption risks should be

¹ See Vietnam Corruption Barometer 2019 (VCB-2019) (https://towardstransparency.vn/wp-content/uploads/2018/11/VCB-2019_EN.pdf)

² The emergence of powerful interest groups, which work together to influence state policies and priorities appears to be a growing concern and trend. According to TT's Vietnam Corruption Barometer 2019, 54% of Vietnamese citizens believe that special interest groups often/always insert undue influence on government policies and decisions for their own interest (increased from 36% recorded in TI/TT GCB 2013).

³ According to TT's Vietnam Corruption Barometer 2019 (VCB-2019), 49% of respondents said that the government's AC actions are effective or very effective, more than twice the amount in 2016 (21%). However, in 2019 corruption ranked as the fourth biggest concerns in the 2019 Barometer survey (following poverty reduction, food hygiene, and crime/safety) as compared to seventh in the 2017 Barometer Survey.

⁴ See 16.4: By 2030, significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime and 16.5: Substantially reduce corruption and bribery in all their forms, at <https://sdgs.un.org/goals/goal16>

⁵ Linked to 16.6. Develop effective, inclusive, participatory and representative decision-making at all levels; and 16.9. Ensure public access to information and protect fundamental freedom, in accordance with national legislation and international agreements.

identified and mitigation solutions be developed and implemented; integrity in public procurement should be reinforced and monitored through tools easily accessible by the public.

Our strategy is based on the assumption that:

- Corruption will continue to be high on the national agenda and fighting corruption will remain a priority of the ruling Party and the Government of Vietnam⁶.
- Citizens, especially young people will continue to be increasingly concerned about and willing to take action to challenge corruption⁷.
- The development of new technologies will provide more instruments for the mobilization of people in anti-corruption and increase transparency but will also enable new forms of corruption and present new difficulties for anti-corruption work.
- Vietnam's deeper integration in the international economy will entail both incentives and challenges for the Government and local companies to comply with international rules and standards.
- The COVID-19 pandemic will continue to have lasting effects over the coming years. New corruption risks will emerge and the results of emergency procurement will require attention and scrutiny, especially appropriate accountability and integrity mechanisms.
- Vietnam's vulnerability to climate change will continue to bring a large amount of climate finance to the country, and many chances for abuse of funds along with it.

3. OUR STRATEGIC PRIORITIES

In the 2021-2025 period, we will focus on three strategic and interlinked areas: **Anti-corruption Legislation & Enforcement, Citizen Engagement, and Business Integrity**. When citizens (youth in particular) and businesses demand higher integrity, it puts pressure on the government and the public sector to strengthen its commitment to curb corruption and become more transparent and accountable. Reciprocally, increased open governance leads to improved space for citizens to engage. Anti-corruption legislation enforcement in turn incentivizes business integrity and broader society's participation.

To meet these interacting objectives, TT will work closely and constructively with various change makers from the State and anti-corruption agencies; female leaders and youth; NGOs and journalists; business associations and small and medium-sized enterprises (SMEs). Our logical framework for change (see Annex 1) follows the results-based approach which presents the changes that we want to see by 2025 in anti-corruption in Vietnam. This framework incorporates both top-down and bottom-up approaches, allows us to mobilize and maximize the resources and strengths of the key actors, and enable our interventions in selected areas with regard to both anti-corruption legislation and practice.

1. Anti-Corruption Legislation & Enforcement

Strengthen the Government's commitments and actions against corruption

⇒ *The Government endorses new mechanisms and guidelines to improve anti-corruption legislation and its enforcement*

In the next five-year period, TT will continue to push for improvements in the Vietnamese legislation on anti-corruption (especially the Law on Access to Information, the Anti-Corruption Law and the Penal Code) with a view to narrowing the gaps in national law and making it more in line with international standards. We will focus **on selected issues such as asset declaration and disclosure; mechanisms to ensure effective enforcement of anti-corruption laws and to encourage non-state actors' participation in anti-corruption**. We will also continue promoting international best practices on governance and anti-corruption and monitoring the

⁶ <https://en.nhandan.org.vn/politics/domestic/item/8912502-top-leader-chairs-18th-session-of-central-steering-committee-for-anti-corruption.html>

⁷ According to VCB-2019, 71% of respondents believe they have a role to play in the fight against corruption, up from 55% in 2016 and 60% in 2013. According to YIS-2019, 80% of Vietnamese young people believe that youth can take action against corruption and play a role in promoting integrity.

implementation of Vietnam's international commitments on anti-corruption such as the United Nations Convention Against Corruption (UNCAC) and SDGs. TT's research and analysis, such as Vietnam Corruption Barometer (VCB), will keep serving as key dataset for the need to strengthen legislation and enforcement.

⇒ *The Government strengthens regulations on the use and management of public funding*

TT's stakeholders' online survey indicates that one of the biggest challenges in anti-corruption in Vietnam is the monitoring of transparency in public spending. In the next strategic period, TT will contribute to tackling this challenge through developing specific tools or solutions that would **identify corruption risks in selected areas prone to corruption such as health or climate finance and help citizens to track how public money is used and managed**. Regarding Climate finance, Vietnam is amongst the top 3 largest recipients of climate finance in the world.⁸ Given the dual pressure of climate change and corruption, it is crucial to ensure that the funds actually help the most vulnerable people and halt the march of climate change. For tool development, we will make use of the power of technology and partnership with value-minded partners and/or with selected members of the local ICT network⁹. Based on the findings of our future risk assessment, we will advocate for the relevant government ministries to make necessary adjustments to the regulations on public funding so that it will be used in a more transparent and accountable manner.

2. Citizen Engagement

Empower and increase space for citizens to engage in anti-corruption

⇒ *Citizens see better the benefits of integrity and take action to challenge corruption*

Engaging citizens, especially young people in anti-corruption has been a key pillar of TT's work over the past ten years. This is based on TT's strong belief that for a change to be sustainable, it must be underpinned by a widespread public and more specifically by youth's support and engagement- who make up more than half of the Vietnamese population. Two of our key achievements in this area are the Youth Integrity Surveys, which explore perceptions and experiences of corruption by Vietnamese youth, and the organization of the Vietnam Integrity School (VIS)- an innovative model of value education that teaches young people about integrity and creates a space for them to promote and practice this value. Taking into account increased interest in the topic, TT will explore how to add value of integrity into existing youth networks and set up a partnership with a local university for increasing the outreach and sustainability of VIS. We will seize any opportunities to scale this work up with partners.

Based on TT's 2019 Vietnam Corruption Barometer's finding that women can be strong players in anti-corruption, and in line with broader aspiration of gender equality, TT will also seek ways to engage and empower women leaders in both public and private sectors who have capacity to influence others for better anti-corruption outcomes.

⇒ *CSOs and media increasingly engage in anti-corruption*

Over the last five years, TT has been advocating for Open Government as an innovative international good practice to increase government transparency and accountability as well as citizens' engagement in anti-corruption. To make sure that people have adequate space to raise their voice and play their role in the fight against corruption, we will strengthen and foster alliances with like-minded partners and networks for collective advocacy, focusing on the key Open Government's principle of civic participation and the enabling environment for civil society.

We will promote the role of the media and seek ways to help enhance journalists' capacity to investigate and report on corruption, especially skills to exploit and analyze open data. We will also make full use of social media

⁸ How climate finance 'flows' around the world: see <https://www.carbonbrief.org/interactive-how-climate-finance-flows-around-the-world>.

⁹ TT will conduct an analysis of the Government's National Program on Digital Transformation to 2025 to inform its future potential actions.

as a powerful communication channel to raise public awareness and engage people in public debates on anti-corruption issues.

3. Business Integrity

Increase companies' awareness and capacity to practice integrity

⇒ *SMEs have more tools and knowledge to practice integrity*

TT's experience of working with the private sector in the last period shows that local companies, especially SMEs, are still not fully aware of the importance of business integrity. The revised national anti-corruption legislation in the private sector brings a renewed opportunity for TT. TT will develop tailor-made training modules and materials and **provide trainings** for interested local companies, targeting **SMEs**, while continuing our efforts for enhanced business awareness. In order to do this, we will make full use of Transparency International's resources on business integrity and TT's business network, such as the Vietnam Chamber of Commerce and Industry (VCCI) and other business organizations, along with improving our own training capacity.

⇒ *Large foreign (FDI) and local companies promote integrity, transparency and accountability*

The Vietnamese business community will increasingly face obligations to meet the requirements of global and regional economic integration, which includes the need to demonstrate compliance with international anti-corruption commitments and anti-bribery laws. Aiming at raising integrity standards and helping to create a level playing field for companies operating in Vietnam, TT will **build a Vietnam Business Integrity Forum (VBIF)**, based on the successful Transparency International model. VBIF will be joined by leading businesses that can show their support for our work and demonstrate high commitment to fighting corruption; it will act as a "forum" for interactive exchange of views, ideas and initiatives between TT and companies, and between companies themselves.

4. MAKING IT HAPPEN: OUR STRATEGIC APPROACHES

TT's organizational objective remains to continue developing an organization that is professional, sustainable and serves as a leading expert on anti-corruption in Vietnam. To deliver the next five-year strategy, TT will adopt the following strategic approaches:

The role we want to play

- **Knowledge builder and facilitator:** Our stakeholder survey shows that TT has been seen as a leading independent civil society organization in promoting transparency, integrity and anti-corruption in Vietnam. We will further capitalize on our recognized strengths, namely a) producing quality knowledge and evidence on corruption and anti-corruption; and b) being part of a strong international network as a member of the TI movement. In this regard, we will strengthen our role as a local anti-corruption knowledge builder and further the role of a knowledge facilitator of international anti-corruption experience to local anti-corruption actors.
- **Advocate:** TT draws on expert knowledge and evidence to advocate for anti-corruption standards and practices. Each year, we produce legal analyses, policy papers, and reports such as the Youth Integrity Survey and/or the Global Corruption Barometer. Data, key messages and recommendations of these studies reach various decision makers and are widely covered by the media, contributing to raising public awareness and enabling changes in policy. To make our advocacy work with Vietnamese authorities fruitful, we will continue our constructive engagement approach.

- **Co-creator:** Taking into account lessons we learned and challenges we faced in piloting successful anti-corruption solutions workable elsewhere during the past years, we are going to adopt a new role: co-creating anti-corruption tools and solutions with partners. This implies a new way of thinking and working which requires us to be more patient, humble and vulnerable to share and receive out-of-the box ideas and concepts, be challenged by and learn through successes and failures, with partners. As corruption “innovates” faster than us, creative ideas embracing the current trends towards digitalization of Vietnam’s public administration will possibly help generating breakthrough new ideas for solving specific corruption problems. Capacity to identify, select and walk in miles with the right and values-driven partners, including those working in ICT sector will be crucial.
- **Service-provider:** To help raise revenue and balance TT’s dependence on donors’ funding and increasing the organization’s financial sustainability, TT will learn to gradually become a service provider, developing training service packages targeting companies (and other actors such as NGOs) interested in preventing corruption risks in their operation. In the past years, TT had provided companies with capacity to build internal Corporate Integrity Programme (CIP) based on TI’s anti-bribery tools. To this end, we will need to enhance in-house capacity, while furthering our insights into the market’s needs for CIP training services.

Partnership & networking

Since its inception, TT has been working in partnership with both individuals and organizations, supporting and contributing to a number of regional and local networks. We recognize the value of **collective voices and actions for sustainable impacts**. To achieve the changes set out in this strategy, TT will continue to proactively engage with a wide range of stakeholders and partners from public, private and civil society sectors to achieve sustainable and collective impacts. Internationally, we will strengthen our cooperation with influential bodies such as Open Government Partnership (OGP) and deepen partnership with selected TI’s chapters in other countries for peer-to-peer learning and cooperation. We will seek partnerships with NGOs, academia and networks, especially those involving young people and women. We commit to keep sharing our values, knowledge and expertise with leaders in public and private sectors, and explore ways to work effectively together for increased transparency and integrity.

Resource mobilization

A key focus for the next 5 year is the development of a financially sustainable model for advancing TT’s initial anti-corruption impacts and achieving the key changes we want to see in Vietnam. Continuous fundraising will be crucial for our future work. In terms of governance, TT will put concerted efforts into **maintaining strong accountable relationships with key partners and funders**. We see two major directions for mobilizing resources: a) diversifying our funding base to include other INGOs and private foundations in addition to traditional funders (foreign embassies and bilateral donors); and b) building our internal capacity for self-generated revenue.

Towards achieving the latter, the 2025 strategy will see the development of a *Vietnam Business Integrity Forum* (VBIF). It is expected that financial support from large companies will enable long-term and sustainable approach to our private sector work. TT will also build our own capacity for expanding to service delivery (as described in the above session “*The role we want to play*”), focusing on development and provision of business integrity trainings to companies.

The role of the Advisory Board

TT’s Advisory Board has been established to provide comments, advice and recommendations on the strategic direction of our work. The advisory board has been reinforced in 2019 with the presence of two foreign anti-corruption experts. The board’s role is crucial, not only in providing TT with support to design its 5-year strategy, but also in regularly advising TT on current matters and encountered institutional and administrative difficulties related to anti-corruption. TT envisages to further recruit diversified board members in the coming years, preferably women.

Communications

Looking ahead, TT's ultimate communication goal is to turn "Integrity" into a value to be embraced and practiced by wider society. We commit to an inclusive communications approach, tailored to reach diverse audiences using different platforms. In particular, we hope to see business integrity champions joining us as partners and allies and young anti-corruption pioneers in the education system advocating for change. We will use accessible and engaging language to expand TT's base of supporters who promote transparency and integrity.

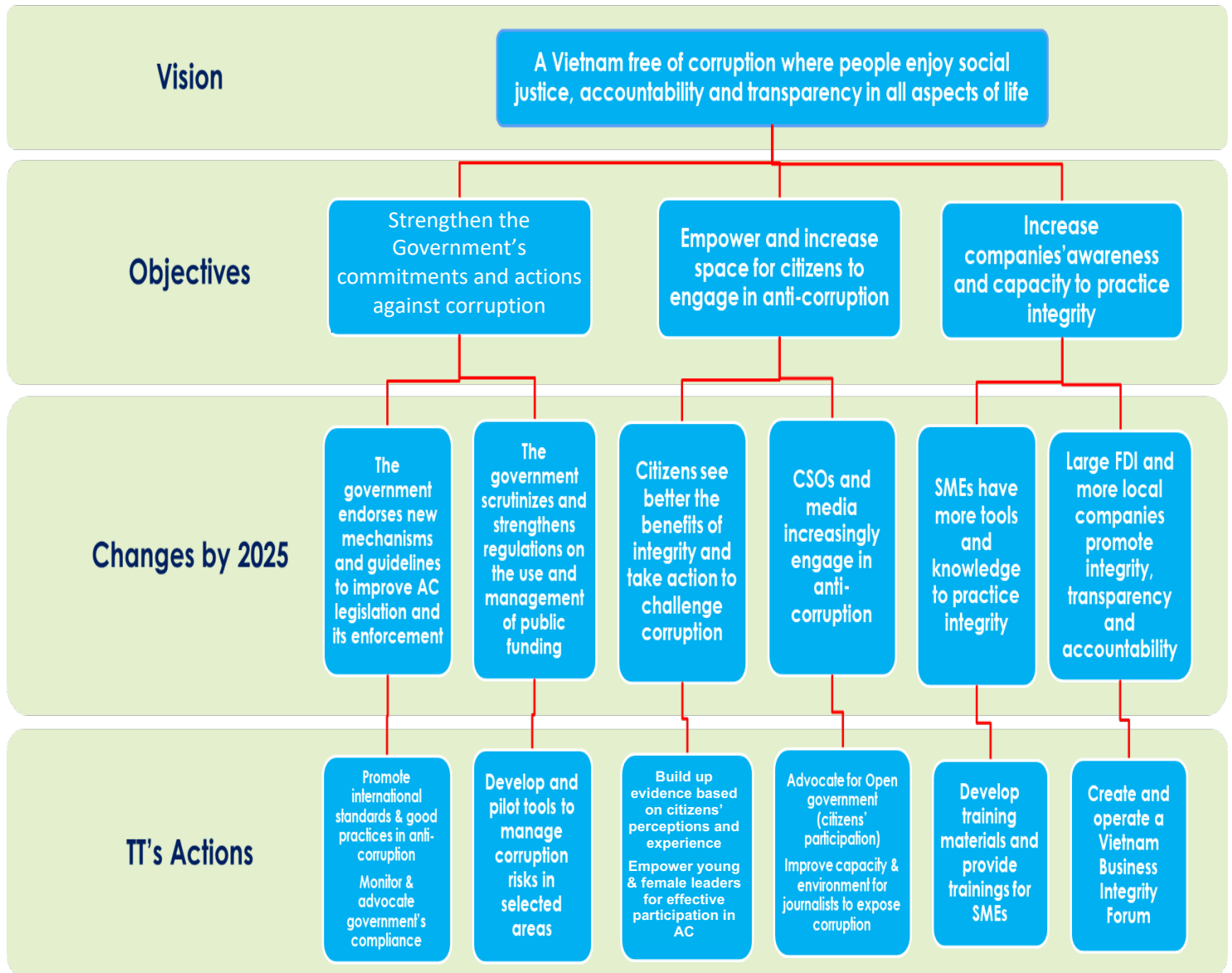
Monitoring, Evaluation & Learning

We have learned from governance reforms over the last decade that change is not linear. Fighting corruption, especially in a Vietnam's challenging context, requires an **adaptive and flexible approach**. To that end, TT will regularly monitor progress towards achieving the 2025 framework for change. Based on Transparency International's Monitoring, Evaluation and Learning Framework (MEL)¹⁰, we will regularly collect data to build an increased understanding of what works and what does not work in the fight against corruption in Vietnam. We will organize internal and external learning reviews after the first two-and-a-half years' implementation of the strategy for possible adaptation and improvement in the remaining years.

¹⁰ See <https://www.transparency.org/en/the-organisation/impact-monitoring>

5. ANNEXES

1. Framework for Change (2021-2025)



2. About this strategy

Towards Transparency (TT) is a Vietnamese non-profit consultancy company founded in 2008 to contribute to the prevention of and fight against corruption. In March 2009, TT became the official National Contact of Transparency International - a global anti-corruption movement, comprised of more than 100 National Chapters and an International Secretariat (TI-S) in Berlin, Germany. Since 2009, TT has been together with TI-S designing and executing TI Vietnam Programs 2009-2012, 2013-2015 and the 2016-2020 strategy.

To support its mission to strengthen the voice and participation of wider society in anti-corruption (AC) efforts, in late 2019 TT kicked off the development of its new five-year strategy (2021- 2025). In order to finalize this document, we have gone through the following process.

1. **Internal discussions** held in late 2019 which focused on analysis of internal and external context, new opportunities and challenges for TT's work, based on achievements and lessons learnt in implementing the recent 5-year TT/TI Strategy (2016-2020).
2. **External consultations** conducted in summer 2020 with an online stakeholder survey, designed with support from TT's board of advisors, with a view to: 1/ learning more about the key trends likely to affect the nature and extent of corruption in Vietnam over the coming years; 2/ knowing how TT's role should evolve alongside these trends, and 3/ seeking stakeholders' views and ideas on emerging issues and challenges, for the fight against corruption in Vietnam. We received 50 responses from a diverse group of stakeholders (government, civil society, donors, private sector and academia).
3. **A 2-day internal strategic planning workshop** in summer 2020, with a view to: 1/ assessing the key findings of the online stakeholder survey, 2/refining our own understanding and analysis of internal and external context in which TT operates in; and 3/defining strategic orientations for the next 5 years, based on TT's strengths & weaknesses, as well as on the emerging challenges in anti-corruption in Vietnam.
4. **Consultation and validation** of the draft strategy (TT's board of advisors, TI-S and other stakeholders).

In synergy with Transparency International's Strategic Framework towards 2030¹¹, reflecting on Vietnam's specific anti-corruption landscape and TT's achievements and lessons learnt from the last period, this strategy provides a framework of change for TT to make a distinctive contribution to the fight against corruption in the next five years in Vietnam.

3 biggest challenges



Anti-corruption challenges according to stakeholders

¹¹ Formally adopted by Transparency International's Annual Membership Meeting in November 2020